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September 13, 2022

The Honorable Sanket J. Bulsara  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Securities and Exchange Commission v. Vale S.A., No. 22-cv-2405 (E.D.N.Y.) (RJD) (SJB)

Dear Judge Bulsara:

Pursuant to the Court's Orders dated June 29, 2022 and July 5, 2022, Plaintiff Securities and Exchange Commission ("SEC") and Defendant Vale S.A. ("Vale") jointly submit the enclosed 26(f) Report, Protective Order, and ESI Protocol in advance of the September 15, 2022 initial pre-trial conference in this matter.

Respectfully Submitted,

/s/ Jennifer Kennedy Park  
Jennifer Kennedy Park

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/s/ Dean M. Conway  
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cc: All Counsel of Record (via ECF)  
Enclosures